

Exhibit A

SUPREME COURT OF THE STATE OF NEW YORK

NEW YORK COUNTY

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KEVIN BARNES,

Plaintiff,

- against -

CARSON BLOCK and MUDDY WATERS, LLC.

Defendants.

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SUMMONS WITH NOTICE

Index No. _____

Plaintiff designates New York County as

place of trial; Venue is proper pursuant to

CPLR § 503(a)

TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEARBY SUMMONED to appear in this action by serving a notice of

appearance upon the undersigned counsel at the address set forth below within twenty (20) days

after the service of this summons, exclusive of the day of service, or within thirty (30) days after

service is complete, if the summons is not personally delivered to you within the State of New

York; and in the case of your failure to appear or answer, judgment will be taken against you by

default for the relief demanded herein.

YOU ARE HEREBY NOTICED that the nature of this action is breach of partnership,

unjust enrichment, and constructive trust, arising out of plaintiff Kevin Barnes’ and defendants

Carson Block, Esquire, (“Block”)'s and Muddy Waters, LLC’s (“MW”)'s collaboration to

conduct research of publicly available information regarding certain NYSE/NASDAQ traded

companies, and to publicly publish information concerning mutually-selected companies, for the

purpose of exposing corporate misconduct. After months of full-time collaboration across

multiple time zones, the parties successfully published an online report exposing ongoing fraud

at a company publicly traded on the NASDAQ stock exchange in New York County (the

“Report”). As a result of the parties’ publication of the Report, the United States Securities and

Exchange Commission (SEC) granted Block an approximately \$14 million whistleblower award

on March 11, 2022 (the “Award”). Defendants have refused to compensate Barnes from the Award or provide a reconciliation of such funds. Moreover, defendants have wrongfully asserted exclusive control over the Report and excluded Barnes from transparency into the SEC determination process, resulting in defendants’ negligently prosecuting the matter.

YOU ARE FURTHER HEREBY NOTICED THAT venue is proper because (i) plaintiff and defendants formed their partnership and met repeatedly in New York County; (ii) Block regularly conducts business in New York County, including as recently as July 11th and March 29th 2022, promoting in New York County his reputation as an activist short-seller of NYSE/NASDAQ listed companies, (iii) Block prosecuted the SEC whistleblower proceeding through counsel domiciled in New York County, and (iv) Block’s new wholly-owned entity, “Muddy Waters Capital, LLC,” was a petitioner against Google, Inc. in a previous New York Supreme Court matter and defendant Block executed pleadings for the proceeding (Index Number 159730/2017). Thus, venue is proper pursuant to CPLR § 503(a).

YOU ARE FURTHER NOTICED THAT the relief sought is damages in the amount exceeding \$7,000,000 and injunctive relief.

YOU ARE HEREBY NOTIFIED THAT should you fail to answer or appear, a judgement will be entered against you by default for \$7,000,000 with interest from the date of the filing and the costs of this action.

Dated: July 25, 2022
New York, NY

SLARSKEY, LLC

By: 
David Slarskey
Evan Fried
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New York, NY 10170
(646) 893-6082
Counsel for Plaintiff